1 2	Aaron Joseph Ver, Bar No. 295409 <u>Aver@perkinscoie.com</u> PERKINS COIE LLP 505 Howard Street, Suite 1000	
3	San Francisco, California 94105 Telephone: 415.344.7000	
4	Facsimile: 415.344.7050	
5	Robert A. Burgoyne (admitted <i>pro hac vice</i>)	
6 7	RBurgoyne@perkinscoie.com Caroline M. Mew (admitted pro hac vice) CMew@perkinscoie.com PERKINS COIE LLP	
8	700 Thirteenth Street, N.W., Suite 800 Washington, D.C. 20005-3960	
9	Telephone: 202.654.6200 Facsimile: 202.654.6211	
10	Attorneys for Defendants NATIONAL BOARD OF MEDICAL EXAMINERS,	
11	and FEDERATION OF STATE MEDICAL BO	
12	Eric G. Young, Bar No. 190104 eyoung@younglawca.com	
13	YOUNG LAW GROUP 411 Russell Avenue, Second Floor	
14	Santa Rosa, California 95403 Telephone: 707.527.3637	
15	Facsimile: 707.289.8059	
16	Attorneys for Plaintiff CORNELL WELLS, JR.	
17	UNITED STATES	DISTRICT COURT
18	NORTHERN DISTRICT OF CALIFORNIA	
19		
20	CORNELL WELLS, JR.,	Case No. 3:21-cv-01279-JSC
21	Plaintiff,	JOINT REPORT ON DEPOSITION
22	V.	SCHEDULING
23	NATIONAL BOARD OF MEDICAL	
2425	EXAMINERS, a not-for-profit corporation, FEDERATION OF STATE MEDICAL BOARDS, INC., a not-for-profit corporation,	
26	Defendants.	
	2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2	
27		
28		

1	Pursuant to the Court's July 13, 2022 Order Following July 13, 2022 Case Management			
	Conference, the parties have identified the following deposition dates:			
3	Dr. George Litchford - August 19, 2022			
4	Dr. Kevin Murphy - August 31, 2022			
5	Dr. Cornell Wells - September 1, 2022			
6	Dr. Annette Swain - August 24, 2022			
7	NBME offered plaintiff three dates for Dr. McGeehan's deposition, but those dates did not			
8 work for plaintiff. The parties will continue to work to finalize a date for Dr. McGeehan's				
9	deposition.			
10	Regarding deposition scheduling, plaintiff's counsel set aside nine dates of availability to			
11	facilitate scheduling all of the depositions: August 17, 18, 19, 24, 25, 26, 31, September 1, and			
12	September 2. Unfortunately, counsel could not agree on a date for Dr. McGeehan. None of the			
13	dates worked for scheduling Dr. McGeehan's deposition.			
14	Plaintiff also intends to take the deposition of Catherine Farmer, Psy.D., who was the			
15	Director of Disability Services for NBME. Plaintiff's counsel understands through meet and			
16	confer with counsel for NBME that Ms. Farmer is no longer employed by NBME. Defendants'			
17	Initial Disclosures dated May 3, 2021 indicated that Dr. Farmer could be contacted through			
18				
19	Ms. Farmer so that plaintiff's counsel can issue a subpoena directly to Dr. Farmer. Plaintiff's			
20	counsel will issue a subpoena forthwith and continue to work with defense counsel to schedule all			
21	remaining depositions.			
22	DATED: July 20, 2022 PERKINS COIE LLP			
23				
24	By <u>/s/ Caroline M. Mew</u> Caroline M. Mew			
25	Attorneys for Defendants			
26	NATIONAL BOARD OF MEDICAL			
27	EXAMINERS, and FEDERATION OF STATE MEDICAL BOARDS, INC.			
28				

Case 3:21-cv-01279-JSC Document 83 Filed 07/21/22 Page 3 of 6

ı	Case 3.21-cv-01279-35C Document 83	Filed 07/21/22 Page 3 01 0
1	DATED: July 20, 2022	YOUNG LAW GROUP
2		Dy /a/Eria G. Voung
3		By /s/ Eric G. Young Eric G. Young
4		Attorneys for Plaintiff
5		CORNELL WELLS, JR.
6 7		
8		
9		
10		
11		
12		
13		
14		
15		
16		
17		
18		
19 20		
21		
22		
23		
24		
25		
26		
27		
28		

1	CERTIFICATE OF SERVICE				
2	I hereby certify that I served the foregoing Joint Report on Deposition Scheduling on the				
3	following:				
4	Frie G. Voung				
5	Eric G. Young YOUNG LAW GROUP All Russell Avenue, Second Floor				
6	411 Russell Avenue, Second Floor Santa Rosa, California 95403				
7	To be sent by the following indicated method or methods, on the date set forth below:				
8	by sending via the court's electronic filing system				
9	by email				
10	by mail				
11	by hand delivery				
12					
13	DATED: July 20, 2022 PERKINS COIE LLP				
14	Dru /a/Canalin a M. Man				
15	By:/s/Caroline M. Mew Caroline M. Mew, Bar No. 467354				
16	CMew@perkinscoie.com 700 Thirteenth Street, N.W., Suite 800				
17	Washington, D.C. 20005-3960 Telephone: +1.202.654.6200				
18	Facsimile: +1.202.654.6211				
19					
20 21					
21 22					
23					
24					
25					
26					
27					
28 PAGE	Perkins Coie LLP 700 Thirteenth Street, N.W., Suite 800 Washington D.C. 20005-3960				

700 Thirteenth Street, N.W., Suite 800 Washington, D.C. 20005-3960 Phone: +1.202.654.6200 Fax: +1.202.654.6211

CERTIFICATE OF SERVICE

Wells Jr. v. National Board of Medical Examiners, et al.

USDC-ND, Oakland Division, Case No. 3:21-cv-01279-JSC

At the time of service, I was over 18 years of age and not a party to this action. My business address is 411 Russell Avenue, Santa Rosa, CA 95403. I am employed in the office of a member of the bar of this Court at whose direction the service was made.

On July 21, 2022, I served the following identified document(s):

JOINT REPORT ON DEPOSITION SCHEDULING

I served the document(s) on all interested parties as follows:

Name of Party/Counsel Served:	Attorney For:
Aaron J. Ver	Attorneys for National Board of Medical
Caroline Mew	Examiners, and Federation of State
Robert Burgoyne	Medical Boards, Inc.
Perkins Coie LLP	·
505 Howard Street, Ste. 1000	
San Francisco, CA 94105	
Tel: 415-344-7000	
AVer@perkinscoie.com	
CMew@perkinscoie.com	
RBurgoyne@perkinscoie.com	

I served the above-named documents as follows:

BY FACSIMILE TRANSMISSION - pursuant to agreement of the parties, from fax number (707) 289-8059 to the fax number(s) set forth above. The facsimile machine I used complied with Rule 2.301(3) and no error was reported by the machine. Pursuant to Rule 2.306(h)(4), I caused the machine to print a transmission record, a copy of which is attached.

BY MAIL -

9

11

12

13

14

15

16

17

20

21

22

23

24

25

26

27

28

By personally depositing the documents in a sealed envelope addressed as set forth above with the U.S. Postal Service, postage fully prepaid, sent by regular mail and certified mail, return receipt requested

X By placing documents enclosed in a sealed envelope addressed as set forth above for collection and mailing. I am readily familiar with my firm's practice of collection and processing correspondence for mailing. In the ordinary course of my firm's business, correspondence is deposited with U.S. postal service on the same day it is placed for collection, postage fully prepaid.

BY PERSONAL SERVICE - by delivering a copy of the document(s) by hand to the addressee.

BY EXPRESS SERVICE - by depositing in a box or other facility regularly maintained by the



1 2	express service carrier or delivering to an authorized courier or driver authorized by the express service carrier to receive documents, in an envelope or package designated by the express service carrier with delivery fees paid or provided for, addressed to the person on whom it is to be served.
3	XBY ELECTRONIC TRANSMISSION - pursuant to agreement of the parties, or by Court order, transmitting a PDF version of the document(s) by electronic mail to the party(ies) identified above using the e-mail address(es) indicated.
5 6 7 8	BY ELECTRONIC TRANSMISSION ONLY DURING CORONAVIRUS/COVID-19 PANDEMIC – The document(s) were emailed to the persons at email addresses listed based on notice previously provided that, during the Coronavirus (COVID-19) pandemic, this office will be primarily working remotely, unable to send physical mail as usual, and is therefore using only electronic mail. No electronic message or other indication that the transmission was unsuccessful was received within a reasonable time after the transmission.
9 10	I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.
11	XI declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.
12	Date: July 21, 2022 YOUNG LAW GROUP
13	
14	/s/Eric G. Young
15	Eric G. Young
16	
17	
18	
19	
20	
21	
22	
23	
24	
25	
26	
27	
28	
	PLEADING - 2